

Edward L. Schnitzer  
Montgomery McCracken Walker & Rhoads LLP  
437 Madison Ave  
New York, New York 10022  
(212) 867-9500

*Attorneys for Hankook Tire America Corp.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X		
In re:	:	Chapter 11
	:	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	:	Case No. 18-23538-rdd
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**DECLARATION OF MI SOOK ("ELYSIA") KIM, HANKOOK TIRE AMERICA CORP.**

I, Mi Sook ("Elysia") Kim, declare the following to be true and correct under penalty of perjury.

1. I am over the age of 18, and I have personal knowledge of the statements in this Declaration.

2. I am employed by Hankook Tire America Corp. ("Hankook") as Manager, Accounts Receivable and Credit, America HQ, and I have held that position since approximately 1998.

3. Among my responsibilities as Manager, Accounts Receivable and Credit, America HQ, I am responsible for the Sears, Roebuck & Co. ("Sears") account, supervising several other employees.

4. In July 2016, Hankook relocated its headquarters from 1450 Valley Road, Wayne, New Jersey 07470 to 333 Commerce Street, Suite 600, Nashville, Tennessee 37201.

5. Hankook sent all of its customers a letter dated July 20, 2016 informing them of Hankook's new address, effective August 1, 2016 (the "Relocation Letter"). A true and correct copy of the Relocation Letter is attached as Exhibit A.

6. Since Sears was Hankook's customer in July 2016, the Relocation Letter would have been sent to Sears at that time.

7. To my knowledge, Hankook did not receive any notices of pleadings filed, orders entered, or notices generated in the Sears bankruptcy case.

FURTHER, DECLARANT SAITH NOT.

Executed on this the 1 day of October 2019.

  
\_\_\_\_\_  
Mi Sook Kim